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OUR FILE NO. 12,999J

February 16, 2017

Electronically filed

Honorable Ann Marie Donio, USDC  
**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEW JERSEY**  
Mitchell H. Cohen Federal Court House  
1 John F. Gerry Plaza  
Camden, NJ 08181

**Re: Estate of Matthew McCloskey, et als v. Franklin Township, et als  
Civil Action No. 1:15-cv-04171 (JHR/AMD)**

Dear Judge Donio:

As Your Honor is aware, this office has been retained to represent the interests of the Defendants, Franklin Township and Officer Nicholas Locilento in the above matter.

The plaintiffs' attorney who has recently filed a Substitution of Attorney, has agreed to execute a Discovery Confidentiality Order, that complies with L. Civ. R. 5.3. I have also attached my Certification that complies with L. Civ. R. 5.3(b)(2). As of this date, there are no issues in dispute with respect to this proposed Order.

If this Order meets with Your Honor's approval, I would ask that it be executed and filed.

By copy of this letter, I am advising all concerned of this development.

Respectfully submitted,  
**BIRCHMEIER & POWELL LLC**  
/s/James R. Birchmeier  
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Enclosures

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